

Exhibit A

Interrogatory No. 7 (Set II):

If YOU and/or any of YOUR employees have been or are under investigation by any governmental entity or entities for any allegedly criminal and/or civil activity or other allegedly wrongful conduct with respect to [DEFENDANT'S DRUG], including without limitation fraud, misrepresentation (including but without limitation, manipulation of any preclinical, nonclinical, animal, clinical, and/or post-clinical study participant selection criteria, protocols, processes, data, and/or results) and/or bribery, identify the governmental entity or entities involved; identify the person(s) you understand to be in charge of each investigation; state the reason(s) for each such investigation as you understand them; state the date on which each such investigation started; describe the current status of each such investigation; and for each such investigation that has been concluded, state how it was resolved.

MERCK'S RESPONSE TO INTERROGATORY NO. 7 (Set II):

Merck objects to this Interrogatory as unrelated to the issues of general causation or preemption that are currently the subject of discovery in this MDL. Merck further objects to this Interrogatory on the basis that it is harassing.

AMYLIN'S RESPONSE TO INTERROGATORY NO. 7 (Set II):

Subject to the Preliminary Statement, Amylin objects to this Interrogatory as irrelevant to the issues of general causation or preemption that are currently the subjects of discovery in this litigation. *See* 8/14/2014 Order at 2:12-19 (defining discovery on preemption issue as question of "what the FDA had or did not have before it on the use of incretin-mimetic therapies and the causal association with *pancreatic cancer*") (emphasis added); 3/25/2014 Order at 3:6-7 (limiting

discovery on general causation issue to that of “the link between the Defendants’ pharmaceuticals and *pancreatic cancer*”) (emphasis added).

ELI LILLY’S RESPONSE TO INTERROGATORY NO. 7 (Set II):

Lilly objects to this interrogatory as not reasonably calculated to lead to discovery of admissible evidence, harassing, and irrelevant to general causation or preemption as defined in the Order Following August 14, 2014 Case Management Conference (Dkt. 567). Lilly further objects to this interrogatory to the extent it seeks information protected by the attorney-client privilege and/or work product doctrine.

NOVO NORDISK’S RESPONSE TO INTERROGATORY NO. 7 (Set II):

NNI incorporates, as if fully set forth herein, the General Objections by reference. NNI further objects to this Interrogatory as overly broad and not reasonably calculated to lead to discoverable information. NNI further objects to this Interrogatory as not relevant to issues in this Litigation, including issues relating to general causation and preemption. NNI further objects to this Interrogatory as harassing.